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STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF AIR & WASTE MANAGEMENT
89 KINGS HIGHWAY
P.O. Box 1401
DOVER, DELAWARE 19903

WASTE MANAGEMENT
SECTION

TELEPHONE: (302) 736-4781

MEMORANDUM

TO: Guy Lee

THRU: Paul J. Janiga
Galina B. Chadwick *MAC 5/31/89*

FROM: Diane E. Wehner *DEW 5-30-89*

SUBJECT: Standard Chlorine of Delaware, Inc., NPDES Permit Reissuance

DATE: May 30, 1989

This memorandum is in response to your and Gary Molchan's attached requests for information and coordination regarding contaminants present or expected to be present in the recovered groundwater, at the Standard Chlorine of Delaware facility.

During our conversation on May 1, 1989, I indicated the only recent data that I can offer you on groundwater contaminant levels at Standard Chlorine have been reported as "total" chlorobenzenes. I also indicated that I have asked Standard Chlorine to submit the data on the levels of individual chlorobenzene compounds rather than a total value but have not received this information as of yet. I suggested you might have more success in obtaining this information from Standard Chlorine directly as they are awaiting reissuance of their NPDES permit from your Division. You agreed to forward any such information to me should they be forthcoming with it.

I appreciate the opportunity to comment on this and will continue to provide you with assistance on the Standard Chlorine facility as needed.

DEW:atm

DEW2226

Attachments

cc: Joseph J. Hardman

AR300048

Galina
FYI - Diana
may need this info.

M E M O R A N D U M

TO: Mr. J. Paul Jones (Air & Waste Management) ✓
Mr. Mike Apgar (Air & Waste Management)

FROM: Mr. Guy Lee, IV (Water Resources) ✓

SUBJECT: Standard Chlorine of Delaware, Inc.
NPDES Permit Reissuance

DATE: April 21, 1989

As you may be aware the NPDES group is presently evaluating permit reissuance for the subject facility. With the promulgation of the Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF) regulations the reissued permit will have chemical specific limitations for 59 organic chemicals including:

- 1) Benzene
- 2) Chlorobenzene
- 3) 1,2,4-Trichlorobenzene
- 4) Hexachlorobenzene
- 5) Chloroform
- 6) 1,2-Dichlorobenzene
- 7) 1,3-Dichlorobenzene
- 8) 1,4-Dichlorobenzene
- 9) Ethylbenzene
- 10) Toluene
- 11) Phenol & most common nitrophenols

In developing chemical specific limitations the OCPSF regulations apply only to process wastewaters. Best Professional Judgment (BPJ) must be used to develop chemical specific allocations for wastewaters generated in the groundwater recovery system.

In determining the appropriate allocations for the groundwater recovery system, I would appreciate if you or appropriate members of your staff could provide information regarding the present operation and proposed future operation of the ground water recovery system with respect to volume of wastewater generated and the concentrations of contaminants present. With respect to this request the following information has been supplied to the NPDES group by the facility.

Groundwater recovery system operations -

Monthly Average Flow Rates

| | | |
|-----------------------------|-------------|-------------------|
| Existing 4 wells | 10 gpm each | Flow rate 40 gpm |
| Proposed 3 additional wells | 40 gpm each | Flow rate 120 gpm |
| Overall total flow (future) | | 160 gpm |

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Chemical Specific Information

Tetrachlorobenzene concentrations

| Month | Groundwater (mg/L) | | | After Stripping (ug/L) | | |
|-------|--------------------|------|------|------------------------|-------|--------|
| | 50% | 95% | 99% | 50% | 95% | 99% |
| 7/88 | 0.17 (56) | 0.54 | 1.01 | 34.5 (48) | 119.4 | 230.4 |
| 8/88 | 0.23 (100) | 0.82 | 1.74 | 70.4 (94) | 345.1 | 893.8 |
| 9/88 | 0.30 (91) | 1.23 | 2.67 | 117.4 (82) | 635.3 | 1673.1 |
| 10/88 | 0.07 (67) | 0.27 | 0.58 | 12.1 (60) | 102.1 | 480.4 |
| 11/88 | 0.06 (107) | 0.17 | 0.33 | 11.9 (73) | 52.2 | 123.3 |
| 12/88 | 0.06 (71) | 0.18 | 0.36 | 15.0 (89) | 52.9 | 102.7 |

Six Month Averages: Groundwater = .15 mg/L After Stripping = 46.7 ug/L

Six month Average % Removal = 68.9 %

(Number of data points used in analysis)

If you or your staff has additional information with respect to (a) contaminants present or expected to be present in the recovered groundwater and (b) known or anticipated levels of contamination, we would appreciate if this information could be made available to the NPDES staff to assist in the permit evaluation. Additionally, any comments with respect to the accuracy of the data submitted by the facility (shown previously) would also be appreciate.

After you have had an opportunity to review this request with the information in your files, please call the writer at 736-5731.

AR300050

RECEIVED
MAY 15

STATE OF DELAWARE
OFFICE OF SOLID WASTE

DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT

MEMORANDUM

TO: Joseph Hardman
J. Paul Jones

FROM: Gary A. Molchan *GAM*

SUBJECT: Standard Chlorine Permit Coordination

DATE: May 1, 1989

The Division of Water Resources is reviewing the NPDES permit for Standard Chlorine of Delaware, Inc. You will note in the attached memorandum that there is a focus on the organic chemicals derived from the processed waste waters and ground water recovery system.

Please have your respective staff work directly with Mr. Lee in providing the necessary information to adequately address their concerns in the development of the NPDES permit. Please keep a record of the time spent in your daily time sheets so that we may track the issuance of these permits. Please advise me of the effect of scheduling public notices and hearings and any overlap in our programs and the water programs in the future.

GAM:pd
GAM89047

Attachment

AR300051

Galina
What is the status of this? I need to advise GAM.
Thanks Joe